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**From:** Blanco-Gonzalez, Joel [Blanco-Gonzalez.Joel@epa.gov]  
**Sent:** 7/17/2015 3:16:44 PM  
**To:** Trulear, Brian [Trulear.Brian@epa.gov]; Walker, Dana [Walker.Dana@epa.gov]  
**Subject:** RE: PCB Requirement for Tinicum Township (PA0028380)  
**Attachments:** Permit Language for NPDES Permittees to Monitor and Submit a PMP 04\_09\_12Final.docx; Permit Language for NPDES Permittees to Monitor and continue PMP Implementation 04\_09\_12Final.docx

Brian,

It is my understanding that these are the templates PADEP has been incorporating into draft NPDES permits. The one that is applicable to Tinicum Township (PA0028380) is "Monitor and Continue PMP Implementation," which has been incorporated into this draft NPDES permit. Therefore, I have no further comments. I will talk to Dana on Monday to discuss related matters. Should you have any questions or concerns regarding this matter, please contact me.

Respectfully,

Joel

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**From:** Trulear, Brian  
**Sent:** Friday, July 17, 2015 10:50 AM  
**To:** Blanco-Gonzalez, Joel; Walker, Dana  
**Subject:** RE: PCB Requirement for Tinicum Township (PA0028380)

I'm not aware of what the latest language has been. A couple years or so ago there was some discussion on the quarterly calls with the States and DRBC regarding updated language (you and Dana I believe were involved in those discussions), which I assume was what you say PA has been using since 2013. The below language doesn't seem to me to be any improvement over what was in the original permits implementing the PCB TMDL. Sounds like something that you all should consider raising again on the quarterly calls.

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**From:** Blanco-Gonzalez, Joel  
**Sent:** Friday, July 17, 2015 10:32 AM  
**To:** Trulear, Brian; Walker, Dana  
**Subject:** PCB Requirement for Tinicum Township (PA0028380)

Brian,

PADEP SERO is proposing this requirement for PCBs. This is the version PADEP has been using since 2013. This version has yet to be updated. Is this the most current version?

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#### ***PCB MINIMIZATION PLAN AND MONITORING***

- A. On December 15, 2003, the U.S. Environmental Protection Agency (EPA), Regions 2 and 3, adopted a Total Maximum Daily Load (TMDL) for Polychlorinated Biphenyls (PCBs) for Zones 2, 3, 4, and 5 of the tidal Delaware River. The TMDLs require the facilities identified as discharging PCBs to these zones of the Delaware River or to the tidal portions of tributaries to these zones to conduct monitoring for 209 PCB congeners, and prepare and implement a PCB Pollutant Minimization Plan (PMP). Subsequent monitoring required by DRBC in 2005 confirmed the presence of PCBs, and*

*indicates that this facility does contribute to 99 percent of the cumulative loadings from all point sources.*

- B. The permittee shall collect two 24-hour composite samples annually during a wet weather flow and two 24-hour composite samples annually during a dry weather flow. The samples shall be collected from Outfall 001.*
- C. All sample analyses shall be performed using EPA Method 1668A, Revision A: Chlorinated Biphenyl Congeners in Water, Soil, Sediment, and Tissue by HRGC/HRMS. EPA-821-R-00-002, December 1999 as supplemented or amended, and results for all 209 PCB congeners shall be reported. Project-specific, sample collection protocols, analytical procedures, and reporting requirements at <http://www.state.nj.us/drbc/quality/toxics/pcbs/monitoring.html> shall be followed. Monitoring information, sample data, and reports associated with PCB monitoring shall be submitted to the DEP and the Delaware River Basin Commission (DRBC) in the form of two compact discs in the format referenced at <http://www.state.nj.us/drbc/library/documents/PCB-EDD011309.pdf>.*

*In accordance with the U.S. EPA, Regions 2 and 3, TMDLs for PCBs for Zones 2–5 of the Tidal Delaware River, the permittee submitted a PMP for PCBs to the DRBC on December 7, 2005, and a completeness determination was issued on July 17, 2006. The permittee shall continue to comply with the requirements of Section 4.30.9 of DRBC's Water Quality Regulations. Therefore, the permittee shall:*

- 1. Continue to implement the PMP to achieve PCB loading reduction goals.*
- 2. Submit an Annual Report on the yearly anniversary of the commencement of the PMP to DRBC and DEP consistent with the guidance specified at <http://www.state.nj.us/drbc/programs/quality/pmp.html>.*

*The PMP Annual Report and PCB data shall be submitted to the DEP and DRBC at the following addresses:*

*PA Department of Environmental Protection  
Southeast Regional Office  
Clean Water Program  
2 East Main Street  
Norristown, PA 19401*

*Delaware River Basin Commission  
Modeling, Monitoring & Assessment Branch  
P.O. Box 7360  
West Trenton, NJ 08628*

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*Should you have any questions or concerns regarding this matter, please contact me.*

*Respectfully,*

*Joel*